

**Metro Nashville**



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# **Limited English Proficiency Plan**

**INFORMATION TECHNOLOGY SERVICES**

**MAY 2024**

## Title VI – Limited English Proficiency Plan

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## Title VI – Limited English Proficiency Plan

### INTRODUCTION

This Limited English Proficiency Plan has been prepared to address the Metropolitan Government of Nashville and Davidson County Information Technology Services (ITS) responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

### PLAN SUMMARY

ITS has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency (LEP) who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

The mission of ITS is to lead the delivery of exceptional technology, service, and solutions. This mission is accomplished by delivering equitable technology solutions, resilient and secure infrastructures, and actionable data insights that help Metro Government enhance the lives and experiences of residents and visitors. Our digital inclusion goals exist to ensure everyone can access, afford, and use technology to achieve all the benefits it can offer. ITS recognizes that providing meaningful language access is a critical function toward building digital equity.

ITS has a plan based on the Four Factor Analysis that defines what action and reasonable steps the department will take when someone is identified with a limited English proficiency (LEP).

### **FACTOR 1: Number or Proportion of LEP Persons Eligible to be Served or Likely Encountered by the Program**

According to the 2023 Census Data (source), estimated Davidson County had a total population of 663,438 residents. Among them, 70,039 individuals (approximately **10.06%**) reported speaking English “less than very well” and are classified as LEP. Spanish (64%), Arabic (9%), and Other Asian and Pacific Island (8%) speakers constitute the largest LEP populations in Davidson County.<sup>i</sup>

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### **FACTOR 2: Frequency with Which LEP Individuals Come in Contact with the Program**

ITS staff reviewed the frequency with which office staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, ITS has had no requests for interpreters and no requests for translated program documents. ITS office staff have had very little contact with LEP persons.

### **FACTOR 3: The Nature and Importance of the Program, Activity, or Services Provided**

Technology touches every part of daily life. We use technology to learn, work, obtain social and healthcare services, and maintain contact with loved ones. In their *Healthy People 2030* agenda, the U.S. Department of Health and Human Services talks about “the conditions in the environments where people are born, live, learn, work, play, worship, and age.” These conditions are known as Social Determinants of Health because they play a part in long-term health outcomes.<sup>ii</sup> Because technology is an underpinning to these factors, it plays a major role in the quality of a person’s life. Our digital inclusion goals exist to make sure that everyone can access, afford, and use technology to achieve all the benefits that it can offer and achieve the best health outcomes possible.<sup>iii</sup>

For non-English speakers, having access to a translation service facilitates effective communication and enables individuals to maximize the benefits and opportunities of technology. ITS Staff is most likely to encounter LEP individuals through phone conversations and written correspondence.

### **FACTOR 4: The Resources Available to Recipient and Costs**

ITS relies on telephonic interpretation and document translation service through Language Line Solutions with over 20,000 interpreters speaking 240+ languages including the languages most often spoken by Davidson County LEP residents.

Pricing varies by activity however the 2024 pricing for telephonic interpretation is \$1.05 per minute with the cost being absorbed by ITS and not passed along to the public.

## **LANGUAGE ASSISTANCE**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the digital inclusion services. Language assistance can include interpretation, which means oral or spoken

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transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

There is a relatively low percentage of LEP individuals, that is, persons who speak English “not well” or “not at all,” however ITS will strive to offer the following measures:

1. ITS staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. Language interpretation and translation service will be accessed for 240+ languages through a telephone interpretation service.

## **STAFF TRAINING**

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities; annually and upon hire.
- Description of language assistance services offered to the public; in person and telephone
- Documentation of language assistance requests

## **TRANSLATION OF DOCUMENTS**

ITS evaluated the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

Due to the small local LEP population, ITS does not have a formal outreach procedure in place. However, when and if the need arises for LEP outreach, ITS will consider the following option. When staff prepares a document, advertisement, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

## **MONITORING**

ITS will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the U.S. Census is available; or when it is identified a higher concentration of LEP individuals are present in Davidson County.

Updates will include:

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- Determination of the current LEP population in Davidson County.
- The number of documented LEP person contacts experienced annually.
- How the needs of LEP persons have been addressed.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether ITS’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether ITS fully complies with the goals of this LEP Plan.

## DISSEMINATION OF ITS LEP PLAN

ITS will provide an internet hyperlink on [www.nashville.gov](http://www.nashville.gov) notifying LEP persons of the LEP Plan and how to access language services on applications and contracts.

### Revision History

Version Number	Date	Changes
1.0	05/01/24	Initial Published Plan
2.0	05/23/24	Grammatical corrections & location of internet link for public.
3.0	05/15/25	Updated Davidson County Census Statistics

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<sup>i</sup> Source: US Census Bureau (2023). Detailed Household Language by Household Limited English Speaking Status. American Community Survey, ACS 5-Year Estimated Detailed Tables, Table B16002. US Census Bureau (2023). Language Spoken at Home. American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1601.

<sup>ii</sup> Healthy People 2030, U.S. Department of Health and Human Services, Office of Disease Prevention and Health Promotion. Retrieved [date graphic was accessed], from <https://health.gov/healthypeople/objectives-and-data/social-determinants-health>

<sup>iii</sup> Sieck CJ, Sheon A, Ancker JS, Castek J, Callahan B, Siefer A. Digital inclusion as a social determinant of health. NPJ Digit Med. 2021 Mar 17;4(1):52. doi: 10.1038/s41746-021-00413-8. PMID: 33731887; PMCID: PMC7969595. From [Digital inclusion as a social determinant of health - PubMed \(nih.gov\)](#)